

ESTTA Tracking number: **ESTTA715429**

Filing date: **12/17/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

|                        |  |
|------------------------|--|
| Proceeding             | 91221556   |
| Party                  | Defendant<br>Kinetescape Holdings, LLC   |
| Correspondence Address | SHEILA FOX MORRISON<br>DAVIS WRIGHT TREMAINE LLP<br>1300 SW 5TH AVE STE 2400<br>PORTLAND, OR 97201-5682<br>UNITED STATES<br>sandilyn@dwt.com, sheilafoxmorrison@dwt.com, pdxtrademarks@dwt.com |
| Submission             | Motion to Suspend for Settlement Discussions   |
| Filer's Name           | Sandi Lyn, Davis Wright Tremaine LLP   |
| Filer's e-mail         | sandilyn@dwt.com, sheilafoxmorrison@dwt.com  |
| Signature              | /Sandi Lyn/  |
| Date                   | 12/17/2015   |
| Attachments            | 91221556_001.pdf(1348761 bytes )   |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of Trademark Serial No. 86/287975  
For the mark: THE EDISON  
Filing Date: May 21, 2014

EDISON MANAGEMENT CO., L.L.C.,

Opposer,

v.

KINETESCAPE HOLDINGS, LLC,

Applicant.

Opposition No. 91221556

MOTION FOR SUSPENSION  
FOR SETTLEMENT PURPOSES  
WITH CONSENT

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

In the matter of Opposition No. 91221556 to the application under the Trademark Act of 1946 under Serial No. 86/287975, the Applicant hereby moves to suspend this proceeding for sixty (60) days and extend the answer and discovery deadlines. The parties are in the process of negotiating an agreement for the settlement of this matter. The Applicant has secured the express consent of all other parties to this proceeding for the suspension and extension requested herein, per email from counsel on December 17, 2015.

Accordingly, the parties request that the deadlines for all remaining activities in this case after resumption be set as follows:

|                          |            |
|--------------------------|------------|
| Proceeding to Resume     | 02/19/2016 |
| Answer Due               | 02/22/2016 |
| Discovery Conference Due | 03/23/2016 |
| Discovery Opens          | 04/22/2016 |
| Initial Disclosures Due  | 04/22/2016 |
| Expert Disclosure Due    | 08/20/2016 |

|   |            |
|---|------------|
| Discovery Closes                        | 09/19/2016 |
| Plaintiff's Pretrial Disclosures        | 11/07/2016 |
| Plaintiff's 30-day Trial Period Ends    | 12/18/2016 |
| Defendant's Pretrial Disclosures        | 01/02/2017 |
| Defendant's 30-day Trial Period Ends    | 02/16/2017 |
| Plaintiff's Rebuttal Disclosures        | 03/03/2017 |
| Plaintiff's 15-day Rebuttal Period Ends | 04/02/2017 |

If the Board is not satisfied with the proposed schedule, the parties request that a new schedule be calculated.

Respectfully submitted this 17<sup>th</sup> day of December, 2015.

DAVIS WRIGHT TREMAINE LLP

By: 

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Of Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Motion for Suspension for Settlement with Consent on Ralph Gaboury, attorney for Opposer, at the e-mail address set forth below (by agreement):

Gaboury@cpsslaw.com

Dated this 17<sup>th</sup> day of December, 2015.

DAVIS WRIGHT TREMAINE LLP

By: 

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